

MIP

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED
08 JAN 30 AM 10:48

UNITED STATES OF AMERICA)

VS.)

Manuel Raudales)

Magistrate Judge Case No:

BY:

08 MJ 0274

DEPUTY

COMPLAINT FOR VIOLATION OF:

21 U.S.C. S 952 & 960


Importation of a Controlled Substance

The undersigned complainant being duly sworn states:

COUNT ONE

On January 29, 2008, within the Southern District of California, Manuel Raudales did knowingly and intentionally import approximately 25.55 kilograms (56.21 pounds) of cocaine, a Schedule I Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.


Signature of Complainant
Special Agent, U.S. Immigration and
Customs Enforcement

Sworn to before me and subscribed in my presence this 30 day of January, 2008.


UNITED STATES MAGISTRATE JUDGE

PROBABLE CAUSE STATEMENT

I, Special Agent Estela Clark, declare under penalty of perjury, the following is true and correct:

At approximately 7:30 a.m., on January 29, 2008, Customs and Border Protection Officer (CBPO) Stuart Hersey with assigned Human and Narcotic Detector Dog "Dada" (NCF030305/IN10) alerted positively to narcotics in a Blue 1998 Ford Explorer bearing Baja California BEF7850.

At approximately 7:40 a.m., on January 29, 2008, Manuel RAUDALES attempted entry into the United States from the Republic of Mexico via the San Ysidro (California) Port of Entry (POE). RAUDALES was the driver and sole occupant of a 1998 blue Ford Explorer bearing Baja California license plate BEF7850.

CBPO Ramon Cortez was performing primary operations when he was approached by RAUDALES. CBPO Cortez approached the vehicle and made contact with RAUDALES. CBPO Cortez asked RAUDALES to turn off the engine and to hand him the keys along with his identification. RAUDALES complied by handing CBPO Cortez the keys, and a DSP-150 laser border crossing card. CBPO Cortez received a negative Customs declarations from RAUDALES. RAUDALES was escorted into the Security Office and the vehicle was taken to the Secondary Lot for further inspection.

On January 29, 2008 at approximately 8:00 a.m., CBPO Nelson Perez was assigned to conduct a 7-point inspection of the vehicle. CBPO Perez discovered packages concealed inside a built-up non-factory compartment. CBPO Perez

removed 20 packages from the vehicle with a total weight of 22.55 Kilograms (56.21 pounds). CBPO Perez probed a random package and it revealed a white powdery substance that tested positive for cocaine.

On January 29, 2008 at approximately 8:35 a.m., Group Supervisor (GS) Juan Jacobo read RAUDALES his rights per Miranda in the Spanish language, as witnessed by SA Scott Lensky. RAUDALES waived his Miranda Rights and agreed to speak without an attorney present. RAUDALES initially denied knowledge of narcotics in the vehicle. At approximately 1:00 p.m., SA Clark and GS Jacobo reapproached RADAULES and he admitted that he knew there were drugs in the vehicle. RAUDALES stated he was taking the vehicle to San Diego, California. RAUDALES admitted he was going to be paid about \$1000.00 US dollars after delivering the vehicle and upon his return to Mexico. RAUDALES was subsequently transported to the Metropolitan Correctional Center. RAUDALES is now pending federal prosecution.